

IN THE UNITED STATES DISTRICT  
COURT FOR THE MIDDLE OF ALABAMA

COURTNEY BOYD (AES # 208921)

Plaintiff,

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V.

DR. DARBOUZE, et al.,

Defendants.

U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA.

2:06-CV-511-WKW

MOTION TO COMPEL PURSUANT  
TO RULE 37(a) AND 33(a)(5)  
FED. CIV. PROC. For Court Case Shaun

Comes Now the Plaintiff Courtney Boyd, moves into this Honorable Court, Pursuant to Rule 37(a)(2)(D) & 33(a)(5), asking them to Compel the Defendant to properly answer the interrogatories and produce the copies which are (Clear) of interrogatories 8, and to fully answer the other questions. The Plaintiff submits the following information

I. The Defendant's Counsel served the Plaintiff with incomplete answers to the question asked. This Honorable Court know by the rule that interrogatories can not go unanswered. The Defendant's Counsel served the Plaintiff with an interrogatories not signed by the Defendants. He only signed his name, but that's not sufficient by rule 37(a)(b)(1)(2).

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2. The Defendants only listed the College educational <sup>background</sup> ~~background~~. The question asked the Defendants to produce a Clear Copy of their "Complete educational <sup>background</sup> ~~background~~", just stating they have attended College, but does not give the years they started and ended College. The word Complete means "everything", so the Defendants should have listed and produce the very first time they attended School until they ended it.
3. The Defendants have failed to answer any of the questions fully and correctly. Surely this Honorable Judge would not order the Defendants to answer any question he felt ~~that~~ that to be irrelevant. They should have produced every serious Complaint or grievance filed against them by an inmate, because it goes to the characteristic of that person.
4. The Defendants should have ~~conducted~~ <sup>conducted</sup> interrogations 10-9-11-12, because it is relevant to the issue at hand.
5. The Defendants Counsel cannot sign these interrogations, and submit to the Court or the plaintiff, because it is incomplete, because without their signature it's unsure that they actually answered the interrogative questions.

Wherefore, the Plaintiff prays that this Honorable Court grant this motion and compel to produce clear and complete copies of their full educational record, and ~~to~~ <sup>to</sup> fully produce a clear complete ~~as~~ <sup>copy of</sup> every serious complaint or grievance, that has been filed against them. Also to answer full ~~and~~ questions 9-10-11-12, because they are relevant to the issue at hand.



### Certificate of Service

I hereto certify that I have served a copy of the foregoing upon the Defendants Counsel, by placing it into FedExing cur, fac. mail 13<sup>th</sup> on May 15, 2007.



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